

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Steven Mendoza,	)	
	)	
	)	
<i>Plaintiff,</i>	)	
	)	
-vs-	)	No. 20 C 670
	)	
Thomas Dart, Sheriff of Cook	)	Judge Bucklo
County, et. al.,	)	
	)	Magistrate Judge McShain
<i>Defendants.</i>	)	

**PLAINTIFF'S AMENDED RULE 30(b)(6) NOTICE**

Defendant Sheriff of Cook County is hereby notified and requested pursuant to Rule 30(b)(6) of the Federal Rule of Civil Procedure to identify and designate an individual or individuals to be deposed in regard to the following matters on or before July 9, 2021, over Zoom that will be recorded by stenography:

1. Officer Sapp was deposed on June 2, 2021, and explained that the public and security staff have access to bathrooms at the 111<sup>th</sup> Street Courthouse that have a grab bar around the toilet area.  
Produce a designee or designees to explain:
  - a. The location of the bathroom(s) available to the security staff with at least one grab bar around the toilet;
  - b. The month and year when the bathroom(s) available to the security staff had at least one grab bar installed around the toilet;
  - c. The reason(s) why grab bar(s) were installed around the toilet(s) designated for the security staff;
  - d. The location of the bathroom(s) available to the public with at least one grab bar around the toilet;

- e. The month and year when the bathroom(s) available to the public had at least one grab bar installed around the toilet;
  - f. The reason(s) why grab bars were installed around the toilet(s) designated for the public.
- 2. On June 2, 2021, Officer Sapp testified that the holding area supervised by employees of the Sheriff's Office do not have accessible bathrooms for wheelchair-using detainees. From January 1, 2017 to the present, explain the policy and/or procedure to provide accommodations for wheelchair-using detainees to toilet in the custody of the Sheriff's Office at the 111<sup>th</sup> Street Courthouse.
- 3. From January 1, 2015, to the present, action taken by the Sheriff's Office to request Cook County to conduct physical modifications of the 111<sup>th</sup> Street Courthouse to provide accessible toilets and sinks for staff, the public, and detainees.
- 4. From January 1, 2017 to the present, training provided to Sheriff's staff assigned to the 111<sup>th</sup> Street Courthouse to accommodate wheelchair-using detainees in the Sheriff's custody. This includes training regarding placing detainees in cells at this location, transporting wheelchair-using inmates from the vans to the lockup, providing a portable toilet chair to inmates at this location, providing inmates access to either a staff or public bathroom, and providing wheelchair-using detainees with space for attorney-client meetings.
- 5. From January 1, 2017 to December 30, 2019, the location of a portable toilet chair for detainees held at the 111<sup>th</sup> Street Courthouse.
- 6. From January 1, 2017 to December 30, 2019, the notice available at the 111<sup>th</sup> Street Courthouse informing Sheriff's staff and inmates that a portable toilet chair is available upon request.
- 7. From January 1, 2017 to December 30, 2019, the notice available at the 111<sup>th</sup> Street Courthouse informing Sheriff's staff and detainees

that upon request an inmate may be transported to a public accessible bathroom or an accessible staff bathroom.

8. From January 1, 2017 to December 30, 2019, explain the training provided to Sheriff's Office staff regarding documenting use of a portable toilet chair at the 111<sup>th</sup> Street Courthouse.
9. From January 1, 2017 to December 30, 2019, explain the training provided to Sheriff's Office staff regarding documenting the movement of a detainee to either a public ADA compliant bathroom or a staff ADA compliant bathroom.

/s/ Patrick W. Morrissey  
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### **CERTIFICATE OF SERVICE**

I, Patrick W. Morrissey, state that I served the foregoing on the undersigned attorneys for defendants by Email on June 16, 2021.

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